HRP Exchange 55, LLC
c/o Hilco Redevelopment Partners
111 S. Wacker Drive, Suite 3000
Chicago, IL 60606

Via Electronic Mail

April 16, 2020

Julie Armitage
Kent Mohr
Illinois Environmental Protection Agency
1021 North Grand E
Springfield, Illinois 62702

Dear Ms. Armitage and Mr. Mohr:

On behalf of HRP Exchange 55, LLC ("Owner"), thank you speaking with me and Owner's outside counsel Mike Ohm on Monday regarding the recent stack implosion event ("Project") which occurred at approximately 8:00 a.m. on Saturday, April 11, 2020 at the former Crawford Power Plant, 3501 S. Pulaski, Chicago, Illinois ("Site"). The demolition contractor, MCM Management Corp ("MCM") and its subcontractors, Controlled Demolition Inc., Jenkins Environmental, Inc., and Marine Technologies Solutions, directed, controlled and performed the demolition-related work associated with the Project. Below please find Owner's response to your requests for follow-up information and documentation related to the Project:

Request #1: Please provide (a) any available asbestos assessment conducted with respect to the stack including any relevant abatement records; and (b) a copy of the demo asbestos notification form specifically related to the stack.

Response #1:

(a) It has been reported to Owner by MCM that representative asbestos sampling of the stack was performed in June 2019. MCM has provided Owner with copies of the relevant Chain of Custody Record and Bulk Sample Analysis report for the samples collected from the stack, which copies are attached as Exhibit 1. These documents report that the samples were analyzed and found to be non-detect for asbestos components. Additionally, Weaver Consultants Group ("Weaver") was retained to conduct asbestos sampling of the existing remaining stack and associated debris at the Site. Weaver collected nine samples, each of which were submitted for laboratory analysis. Laboratory results concluded that the samples are not asbestos containing materials, as confirmed by the Asbestos Containing Material Survey Report, attached as Exhibit 2.

(b) The Revised Asbestos Project Notification for Former NRG Crawford Generating Station related to the Site, dated March 16, 2020, and attached as Exhibit 3, was submitted to the Illinois Department of Public Health. Because no asbestos containing material was previously identified as being present in the stack, MCM reports that no separate Demolition Project Notification Form was specifically filed or required in connection with implosion of the stack.

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Request #2: Please provide details regarding the response to the incident.

Response #2:

As part of Project planning, MCM has reported to Owner that MCM and its relevant subcontractors developed and implemented a dust control plan which included numerous efforts to control and mitigate dust emissions from the Project. The plan included the use of the following equipment for dust suppression at the direction of MCM: (i) two 5,000 gallon water trucks available to spray water on the ground surface at 100 gallons per minute; (ii) two 30-inch dust boss machines, capable of operating on-site at 40 gallons per minute to suppress dust; and (iii) two Chicago Fire Department fire trucks which were stationed on Site at the time of the implosion to further assist with dust suppression.

According to MCM, on the day of the Project, between approximately 7:15 a.m. until about 8:30 a.m., both of the dust boss machines misted the area where the stack fell. The two fire trucks and water trucks began dust suppression operations immediately following the implosion and before the dust reached the Site boundary. We have been told that the two water trucks continued to operate post-implosion until empty. Additionally, immediately following the implosion, MCM's subcontractor, Illini Street Sweeping, commenced cleaning City streets including the roads surrounding the Site and the public roads in the residential neighborhood to the north of Site. The boundary of the area cleaned using street sweepers was from 31st Street to 33rd Street and Pulaski Road to Lawndale Street. As an additional measure, Owner has agreed to reimburse the City of Chicago for additional street sweeping measures, that the City decides are necessary or appropriate.

On April 13 and 14, HRP personnel contacted residential neighbors located to the north of the Site on a door-to-door basis and offered to provide cleaning services of private property, such as washing windows and vehicles, free of charge. Owner is also currently coordinating with the City of Chicago and affected residents to further facilitate any necessary and appropriate response.

We appreciate the opportunity to provide you with this information. Please contact me or Mike Ohm with any questions.

Best regards,

Anne Garr
General Counsel, Hilco Redevelopment Partners

ATTACHMENT

cc: Michael Ohm

Exhibit 1

STAT Analysis Corporation
2242 W. Harrison, Suite 200, Chicago, Illinois 60612 Phone: (312) 733-0551 Fax: (312) 733-2386
e-mail address: STATinfo@STATAnalysis.com

CHAIN OF CUSTODY RECORD

Page : _____ of _____

Client:	MARINE TECHNOLOGY SOLUTIONS
Street Address:	333 MARKET STREET
City, State, Zip:	SELINSGROVE, PA 17870
Phone:	(570) 374-2081
Fax:	(570) 374-2143
e-mail/Alt. Fax:	clamora@martecsol.com
Project Number:	18-101
Project Name:	CRAWFORD GENERATING PLANT
Project Location:	3501 SOUTH PULASKI, CHICAGO
Project Manager:	CLARENCE LAMORA
P.O. Number:	

Turn Around: Immediate: ☐ 4 Hrs: ☐ 8 Hrs: ☐ 24 Hrs: ☐ 1 Day: ☒ 2 Days: ☐ 3 Days: ☐ 5 Days: ☐

Date Due: _____ Time Due: _____ Note: Not all turn around times are available for all analysis.

Batch No.: 342423

Samples Acceptable: Yes: ☒ No: ☐

Checked by (Initial/Date): 6/14/19

QC by (Initial/Date): _____

Reported By (Initial/Date/Time/Method): AH 6/14/19 TEM

Comments: Bulk

Relinquished by:	Clarence Lamora	Date/Time: 6/13/19 10:45AM
Received by:	Cynette Olivo	Date/Time: 6/13/19 10:45
Relinquished by:	Cynette Olivo	Date/Time: 6/13/19 10:20
Received by:	Vanessa Sepulveda	Date/Time: 6/13/19 10:20
Relinquished by:	Vanessa Sepulveda	Date/Time: 6/13/19 2:10
Received by:		Date/Time: 6/03/19 1430

Client Sample Number/Description:	Date Taken	Time On	Time Off	Rate (lpm)	Volume (Liters)	Area Wiped (ft^2)	Laboratory Sample No.	PCM Asbestos	PLM Asbestos (Bulk)	PLM Point Count	PLM Gravimetric	TEM Air Asbestos	TEM Bulk Asbestos	TEM Gravimetric Asb.	TEM Microvac Asb.	TEM Water		Other:						
BULK SOLIDS 2-0021-19	6/13/19	10:05	10:07			SOLIDS BULK							X											
BULK SOLIDS 2-0022-19	6/13/19	10:07	10:09			SOLIDS BULK							X											

Comments: STACK SAMPLES

STAT Analysis Corporation
2242 West Harrison St., Suite 200, Chicago, IL 60612-3766
Tel: (312) 733-0551 Fax: (312) 733-2386 STATinfo@STATAnalysis.com
AIHA Accreditation # 101160 ; NVLAP Lab Code 101202-0

BULK ASBESTOS ANALYSIS BY TRANSMISSION ELECTRON MICROSCOPY

EPA's "Method for the Determination of Asbestos in Bulk Building Materials"
(EPA 600/R-93-116 - Section 2.5.5.1)

Marine Technology Solutions
333 South Market Street, Suite B
Selinsgrove, PA 17870
Phone: (570) 374-2081

Reference:	18-101	Date Received:	06/13/2019
Location:	Crawford Generating Plant	Date Analyzed:	06/14/2019
Batch No.:	342423	Date Reported:	06/14/2019
Customer No.:	4465	Turn Around Time:	1 Day

Laboratory Sample	Customer Sample Number	Asbestos Components (%)	Non-Asbestos Components (%)
342423001	2-0021-19	ND	Other 100%
342423002	2-0022-19	ND	Other 100%

ND = Asbestos Not Detected
NA = Not Analyzed

Analyzed by Name : Robert J. Schaefer Date: 06/14/2019

Exhibit 2